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*ATTORNEY FOR DEFENDANT*  
*Shalom Ifrah*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
CALIFORNIA**

**UNITED STATES OF AMERICA,**  
**Plaintiffs,**

**vs.**

**SHALOM, IFRAH ET AL.,**

**Defendants.**

**CASE NO. 2:22-CR-0046-TLN**

**STIPULATION TO ALLOW  
DEFENDANT IFRAH' TO TRAVEL  
TO AND FROM NEW YORK;  
DECLARATION OF DAVID E.  
KENNER; ATTACHMENTS A AND B**

**[PROPOSED] ORDER LODGED  
HEREWITH**

IT IS HEREBY STIPULATED by and between Phillip Talbert, United States Attorney, through Roger Yang, Assistant United States Attorney, attorney for Plaintiff, and David E. Kenner, attorney for defendant Shalom Ifrah, with the concurrence of the Pretrial Services Agency, that the defendant may travel to and from Brooklyn, New York, on November 18, 2022 and returning on November 21, 2022.

This request is supplemented by the declaration of undersigned counsel, Exhibits A and B and all the files and records in this case.

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**DECLARATION OF DAVID E. KENNER**

David E. Kenner declares:

1. I am the attorney of record for the herein defendant, Shalom Ifrah.
2. Attached as Exhibit A is a true and correct copy of a receipt showing that, on November 16, 2022, Mr. Ifrah purchased a round trip ticket for his trip to New York (LAX round trip to and from New York)
3. Attached as Exhibit B is a true and correct copy of his temporary residence at an AirBNB while traveling located at: 1174 Eastern Parkway 3, Brooklyn, NY 11213.
4. The reason for Mr. Ifrah' trip is a Jewish Chabad event.
5. I have met and conferred with: (a) Mr. Ifrah' pretrial services officer, Deputy Zepeda, who has indicated that I can represent to the Court that, she has no objection to this request. Also, AUSA Roger Yang has no objection to the court granting this request. Further, they do not oppose Mr. Ifrah' traveling without the location monitoring equipment.

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1 I declare under penalty of perjury, according to the laws of the United States of  
2 America, that the foregoing is true and correct this 17<sup>th</sup> day of November, 2022, at  
3 Encino, California.

4 \_\_\_\_\_/s/\_\_\_\_\_  
David E. Kenner  
5 Attorney at Law  
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# EXHIBIT A

**From:** [Shlomi Ifrah](#)  
**To:** [David Kenner](#)  
**Subject:** Fwd: Your Flight Receipt - SHALOM SHLOMO IFRAH 17NOV22  
**Date:** Wednesday, November 16, 2022 5:53:51 PM

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Here is the flight information

Sent from my iPhone

Begin forwarded message:

**From:** Delta Air Lines <DeltaAirLines@t.delta.com>  
**Date:** November 16, 2022 at 17:52:54 PST  
**To:** shlomi\_ifrah@hotmail.co.il  
**Subject:** Your Flight Receipt - SHALOM SHLOMO IFRAH 17NOV22  
**Reply-To:** Transactional Email Reply Inbox <reply-264062-14\_HTML-63915020-10982494-206509@t.delta.com>

[View as a Web Page](#)



[Join SkyMiles](#)

**CONFIRMATION #: GU6DVH**

Thank you for choosing Delta

You're all set. If your plans change, be sure to make changes or cancel via [MyTrips](#) on [delta.com](#) before your flight departs.

Have a great trip, and thank you for choosing Delta.

### Passenger Info

Name: SHALOM SHLOMO IFRAH

FLIGHT	SEAT

DELTA 554	28D
DELTA 1045	35F

Visit [delta.com](https://delta.com) or download the [Fly Delta app](#) to view, select or change your seat. If you purchased a Delta Comfort+™ seat or a Trip Extra, please visit [My Trips](#) to access a receipt of your purchase.

Thu, 17NOV	DEPART	ARRIVE
DELTA 554 Main Cabin (B)	LOS ANGELES, CA 11:59pm	NYC-KENNEDY 8:22am **Fri 18NOV

Mon, 21NOV	DEPART	ARRIVE
DELTA 1045 Main Cabin (K)	NYC-KENNEDY 8:35am	LOS ANGELES, CA 11:55am

\*\*Arrival date is different than departure date.

**MANAGE MY TRIP**



### Check for Your Destination's Entry Requirements

Many countries have issued travel requirements that may affect your travel plans. We strongly encourage you to review the [Delta Discover Map](#) for the latest on your destination's COVID-19 testing, vaccination and quarantine requirements. If this changes your plans, you may check your eligibility to [change or cancel your flight here](#).

*\*Updated Nov 7, 2022*





## REAL ID–Compliant Licenses or IDs Required as of May 3, 2023

Every air traveler 18 years of age and older will need a REAL ID-compliant driver's license or another acceptable form of ID. Please visit the TSA REAL ID website [here](#) for more information.

### Flight Receipt

Ticket #: 0062349772940

Place of Issue:

Issue Date: 16NOV22

Expiration Date: 31DEC23

METHOD OF PAYMENT	
VI*****9726	\$1352.20 USD

CHARGES	
<b>Air Transportation Charges</b>	
Base Fare	\$1230.70 USD
<b>Taxes, Fees and Charges</b>	
United States - September 11th Security Fee(Passenger Civil Aviation Security Service Fee) (AY)	\$11.20 USD
United States - Transportation Tax (US)	\$92.30 USD
United States - Passenger Facility Charge (XF)	\$9.00 USD
United States - Flight Segment Tax (ZP)	\$9.00 USD
<b>TICKET AMOUNT</b>	<b>\$1352.20 USD</b>

### Checked Bag Allowance

The fees below are based on your original ticket purchase. **If you qualify for free or discounted checked baggage**, this will be taken into account when you check in. Visit [delta.com](https://delta.com) for details on baggage embargoes that may apply to your itinerary.

Thu 17 Nov 2022		LAX-JFK
CARRY ON	FIRST	SECOND
FREE	\$30.00USD (50LBS/23KG)	\$40.00USD (50LBS/23KG)

Visit [delta.com](https://delta.com) for details on [baggage embargoes](#) that may apply to your itinerary.

Mon 21 Nov 2022		JFK-LAX
CARRY ON	FIRST	SECOND
FREE	\$30.00USD (50LBS/23KG)	\$40.00USD (50LBS/23KG)

Visit [delta.com](https://delta.com) for details on [baggage embargoes](#) that may apply to your itinerary.

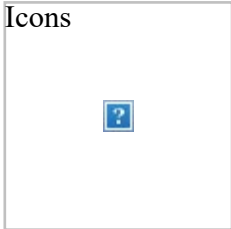
### Your Pre-Trip Checklist for Easier Travel



**Join SkyMiles®**  
Start earning



**Book Hotel And  
Transportation**



**Visit Our  
Help Center**

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# EXHIBIT B

**David Kenner**

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**From:** Shlomi Ifrah <ucolorcenturycityinc@gmail.com>  
**Sent:** Wednesday, November 16, 2022 5:23 PM  
**To:** David Kenner  
**Subject:** Shalom ifrah Reservation confirmed for Brooklyn

Hey David I here is the booking reservations for apartment I will stay in . It's close to 770 eastern parkway- Chabad world center  
I will book tickets now and forward as well  
Sent from my iPhone

Begin forwarded message:

**From:** Airbnb <automated@airbnb.com>  
**Date:** November 16, 2022 at 16:56:08 PST  
**To:** ucourcenturycityinc@gmail.com  
**Subject:** Reservation confirmed for Brooklyn



# Your reservation is confirmed

You're going to Brooklyn!



## **Sunny Private Rooftop Getaway-2 Min To Subway.**

Entire home/apt hosted by Ryan



## Check in

Thursday, November 17, 2022

Check-in is 4:00 PM - 6:00 PM

## Check out

Monday, November 21, 2022

Checkout by 11:00 AM

[View full itinerary](#)

## Address

1174 Eastern Parkway 3, Brooklyn, NY 11213,  
United States

[Get directions](#)

## Guests

3

[Invite guests](#)

## Cancellation policy

This reservation is non-refundable.

Cutoff times are based on the listing's local time

[More details](#)

Your booking is protected by

**aircover**

**[Learn more](#)**

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## Payments

### Payment 1 of 1

PayPal	\$1,480.11
Nov 16, 2022 · 04:55PM PST	

<b>Amount paid (USD)</b>	<b>\$1,480.11</b>
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<b>Balance due (USD)</b>	<b>\$0.00</b>
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## Reservation code

HMKNT8EZ4C

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	<a href="#">Change reservation</a>	
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## House rules

4 guests maximum

Pets allowed

Self check-in with lockbox

**Show more**

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## Safety & property

Carbon monoxide alarm

Smoke alarm

Must climb stairs

**Show more**

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## Ryan is your host

Contact Ryan to coordinate arrival time and key exchange.



**Message host+1 (516) 471-1085**

## **Customer support**

Contact our support team 24/7 from anywhere in the world.

**Visit help center****Contact Airbnb**



### **Check for local travel advisories**

Many places around the world are issuing new restrictions on lodging and travel each day. Before you travel, please check the latest from the local government in order to keep everyone safe and healthy.

**Learn more**



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Many places around the world are issuing new restrictions on lodging and travel each day. Before you travel, please check the latest from the local government in order to keep everyone safe and healthy.

**Learn more**



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San Francisco, CA 94103, USA

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